

**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**Environmental Assessment No. OR-030-08-004**  
**Pedro Mountain Geographic Unit Grazing Permit Renewal**  
**Environmental Assessment**

The Environmental Assessment (EA) contains a description of the proposed action; an analysis of expected impacts on affected interests, land and resources; and measures to reduce negative impacts. The EA analyzes the impacts of a range of alternatives developed through scoping, and indicates that the proposed action with specific design criteria would not significantly affect the human environment.

The BLM established proposed priorities for GU evaluations and for preparations of Coordinated Activity Plans in the Baker RMP (1989). These plans would have addressed all resource issues in one plan. The Planning Update of February 2000 refined this direction to focus on the Healthy Rangelands initiative. The Update established the schedule for evaluation of the GUs using the rangeland standards and guidelines process.

The permittees for the Pedro Mountain allotments were informed about the field work being done in their allotments in 2006 and were invited to participate in rangeland utilization and trend monitoring, Proper Functioning Condition (PFC) assessments, and Standards and Guidelines for Rangeland Health assessments (S&Gs). The monitoring and assessments were completed by multiple members of BLM's staff over many different trips to the allotments.

Letters notifying the public, newspapers, permittees, other agencies, and tribal representatives regarding the process and the upcoming public meeting, were sent out in early November of 2007. The BLM offered to meet individually with the tribes involved. A public meeting was held on November 13, 2007 to provide an overview of the process, distribute the Evaluation and Determinations documents and to answer questions. BLM accepted comments on the Evaluation and Determinations document at the public meeting (and 30 days subsequent to it) and at individual meetings with the permittees in 2007 and 2008. Comments were received about some of the riparian zones, whether they were truly significant enough to be called riparian, and about the fencing and grazing date changes being recommended. No written comments or proposals were provided to BLM to describe an alternative; therefore no permittee proposals were analyzed as an alternative.

The EA was issued along with the unsigned FONSI on March 5, 2009, allowing for a 30 day comment period. Comments were received from the Oregon State Historic Preservation Council (SHPO), Hells Canyon Preservation Council (HCPC) and The Confederated Tribes of the Umatilla Indian Reservation (CTUIR). BLM has reviewed and considered these comments and made significant edits to the EA, which includes the addition of a sub-alternative that permanently reduces or eliminates livestock grazing within 9 of the allotments analyzed. In

addition new information regarding the management of sage-grouse habitat has been published after the EA was originally sent out for public comment. Therefore, Filed Manager Ted Davis made the decision to solicit additional public comments. A list describing those edits may be found in Appendix 4.

After careful review and consideration of impacts of the various alternatives, I have chosen Alternative 3. This alternative changes season of use, reduces AUMs in some of the allotments, implements utilization and minimum riparian stubble height standards, allows gap fence, riparian exclosure, and continuation of allotment fence line construction, and includes consequences for exceeding utilization limits. A reasonable level of livestock management flexibility and sustained forage availability would be provided to permittees with this alternative. Customary permittee grazing practices would be changed in order to protect riparian/wetland and upland vegetation health. Financial commitments necessary to implement the alternative would be secured by BLM as funding becomes available, and through cooperation with grazing permittees. Improved protection of cultural resources and traditional foods would result with this alternative. The implementation of Alternative 3 will allow the allotments to make significant progress toward meeting standards for healthy rangelands, which is required by 43 CFR 4180.2.

*Beneficial and adverse effects.* The cumulative effects are positive, there will be no significant effects (positive or negative) as described by the CEQ definition. Rangeland and watershed health, ecological functions, productivity, upland wildlife habitat, and riparian habitat will be protected and improved by the combined benefits of the proposed actions, which include setting minimum riparian stubble height targets, fencing, reduction in animal unit months (AUMs), eliminating hot season grazing and restricting grazing during the critical plant growth stage (EA, page 10). Special status species will be protected because changes to livestock management, juniper reduction and fencing will improve rangeland health by leaving adequate residual riparian stubble height to protect riparian areas and restricting grazing during the critical growing season which will improve upland rangeland health standards (EA, pages 68-73). Cultural resources will be protected by design features developed during consultation between Baker Resource Area BLM, the Oregon State Historic Preservation Office and the Confederated Tribes of the Umatilla Indian Reservation (EA, page 96). In addition protections from increased livestock distribution and reduce grazing effects on soils, riparian and upland vegetation, which would be beneficial for protection of cultural resources (EA, page 96). Outstanding opportunities for primitive and unconfined recreation will remain, and naturalness will be enhanced. Grazing operations will be more costly to operate, but will remain sustainable.

*Public health or safety.* There will be no significant effects on public health or safety. The proposed gap fences and implementation of the new grazing systems will not significantly affect public health and safety. Any threats will be localized, limited to those involved with construction and maintenance activities, and within accepted norms for such work.

Unique areas. There are no unique, specially managed areas within the Pedro Mountain Geographic Unit, including WSAs, WSRs, and ACECs; thus, none would be significantly affected.

Highly Controversial Effects. The new grazing systems will place new burdens on the affected ranchers, as livestock will be moved more often. The cost of project construction will be partially borne by the permittees and the maintenance responsibility will be totally borne by them. These new costs will be added to the operational costs they already bear and will certainly have negative impacts on their profits. Nevertheless, the grazing operations will remain sustainable, and rangeland health and productivity will be protected and enhanced. Similar measures have been successfully initiated by voluntary agreement with permittees (as under the interim grazing measures initiated in accordance with 43 CFR 4180 in the spring of 2003) and elsewhere on the Vale District. Therefore, they should not be considered controversial. Any effects on the human environment which are related to “land use” allocation issues were addressed and decided in the Baker RMP and Ironside EISs and the subsequent Records of Decision (ROD), and are outside the scope of this EA.

Unique or unknown risks. There are no unique or unknown risks associated with the implementation of the proposed action. The Baker RMP and Ironside EISs, and this EA, cover the anticipated impacts thoroughly. They rely on applicable scientific findings, monitoring, rangeland health assessments, published studies, professional contacts, and stated mitigation measures and project design criteria to address and/or preclude impacts.

Precedent for future actions. There are no precedents, relative to future actions with significant effects, which will be established. The specific actions involved in the proposed action have all been done before, separately and collectively, in the course of management of public lands over the past 50 years. There are no irreversible commitments of resources involved with the proposed action. The structural projects involved could be eliminated and the physical disturbance rehabilitated.

Cumulative Effects. The impact of proposed actions have been analyzed and considered, separately and cumulatively, at multiple scales of analysis by considering the ICBEMP science findings, Baker RMP and Ironside EISs, and this EA. Impacts are either not significant, are mitigated below significance, or were declared and addressed in the Baker RMP and Ironside EISs. The cumulative effect of implementation of the proposed action is also not significant and is within the scope of the cumulative effects analysis disclosed in the Baker RMP and Ironside EISs, which this EA incorporates by reference.

The cumulative effects to sage-grouse was an issue that was brought up during the last public comment period. Given how agriculture and urbanization has resulted in approximately 44,200 acres of sage-grouse habitat loss, we assume the combined effects of past and present actions identified in USWFS listing factor one has resulted in the largest adverse effects to sage-grouse

habitat in the Baker Resource Area administrative boundary. We assume that most of the adverse effects are associated with past management actions that converted private lands to agricultural, public and private lands being converted to non-native annual grass vegetation communities and juniper encroachment on native sagebrush vegetation communities. However, management actions identified in the Pedro Mountain Geographic Unit Grazing Permit Renewal Environmental Assessment dated October 4, 2011, along with reasonable foreseeable juniper and non-native grass reduction projects, would aid in reducing the magnitude of adverse effect as a result of past private and public management actions by increasing the quality of at risk sagebrush communities. Therefore, the additive effect of implementing the preferred alternative would reduce the adverse effects of past land management actions on sage-grouse habitat.

Impacts to significant scientific, cultural, or historic resources. Cultural, historical and/or scientific resources in the area are protected by design features and monitoring, and will not be adversely affected by the proposed action. The combination of management actions and design features under the proposed action will facilitate dispersed distribution of livestock and reduce grazing effects on soils, riparian and upland vegetation, which would be beneficial for protection of cultural resources. Design features, described in section 2.5 of the EA, include inventories prior to any surface disturbing development or project maintenance, continued sampling inventories, and consultation with the Oregon State Historic Preservation Office (SHPO) and Tribes on potential effects and appropriate mitigation measures for any identified eligible or potentially eligible historic properties. Consultation has occurred with the Oregon SHPO and interested tribes. Cultural resource surveys have occurred and will be ongoing throughout the ten year permit. Reports will be provided to interested tribes and Oregon SHPO for newly identified site specific consultation.

Federally listed endangered or threatened species. There are no known federally listed species in Pedro Mountain Geographic Unit. The proposed livestock management, which implements a timing and duration of livestock use that is appropriate for riparian areas, will be beneficial for all wildlife and aquatic species present. If special status species are discovered, additional mitigation measures such as inventory and avoidance of special status plants, and surveys prior to land treatment, would be done in conformance with Oregon/Washington special status species policy. Greater sage-grouse habitats will be protected as a result of livestock utilization limits, reduction of AUMs, changes in season of use, limited project development, project design features, specific mitigation measures associated with projects and by improvement and maintenance of riparian and upland systems through vegetation treatments. These changes will assist in meeting moderate levels of livestock use as recommended by the Oregon Department of Fish and Wildlife's ODFW Sage-Grouse Conservation Assessment Strategy and the Greater Sage-Grouse Conservation Assessment and Strategy for Oregon 2005 (ODFW 2011).

Compliance with federal, state, or local law. The proposed action is in compliance with federal, state, and local law and requirements relative to environmental protection. Further, it is in conformance with the Baker RMP and Ironside EISs and RODs.

Based on the analysis of potential environmental impacts contained in the Environmental Assessment and all other available information, I have determined that the proposed action does not constitute a major federal action that would significantly affect the quality of the human environment. Therefore, an Environmental Impact Statement (EIS) is unnecessary and will not be prepared.

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Ted Davis  
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Date